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Attorneys for Plaintiff Global Freight Systems Co. W.L.L.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

GLOBAL FREIGHT SYSTEMS CO. W.L.L.;
GAMA CENTER; and GENOA PLASTIC
INDUSTRIES,

Plaintiffs,

vs.

AL-MORRELL DEVELOPMENT, L.L.C. and
PAUL A. MORRELL,

Defendants.

**PLAINTIFF'S OBJECTIONS TO
DEFENDANTS' PRETRIAL
DISCLOSURES PURSUANT TO FED.
R. CIV. P. 26(a)(3)**

Case No. 1:14-cv-00133-TC

Honorable Tena Campbell

Plaintiff Global Freight Systems Co. W.L.L. (Global Freight) objects to Defendants' Pretrial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(3), served by defendants Al-Morrell Development, LLC and Paul A. Morrell (Defendants) on March 4, 2016, in connection with the upcoming trial in this case.

I. WITNESSES

Global Freight has no objection to the witnesses that Defendants will or may call at trial. However, Global Freight objects to Defendants' use of depositions for individuals who are available to testify in court.

II. DOCUMENTS

Global Freight has identified a number of exhibits for which it preserves its right to object at trial, but Global Freight may not object in the event its potential objections to foundation, authentication, relevance, incompleteness, and hearsay, are satisfied by the testimony of trial witnesses. Global Freight also reserves the right to hereafter object to any of Defendants' listed exhibits under Rules 402 and 403 of the Federal Rules of Evidence.

Document Description	Bates No./Location	Objection
AMD Transaction Detail by Account January through June 2012	AMD 0183	Foundation; Hearsay
Email from Paul Morrell to Phil Morrell dated November 6, 2011	AMD 0009-11	Relevance
Email from Paul Morrell to Tolly DiCosmo dated January 6, 2012	AMD 0018	Foundation; Relevance
Email from Paul Nelson to Anthony Dsouza dated August 10, 2012	Deposition Exhibit 23	Foundation
Email from Alan Morrell to mohanj@global-freight.net dated November 12, 2012	Deposition Exhibit 24	Foundation; Relevance; Hearsay
All Western Union Wire Transfer and Invoices dated December 12, 2011; November 2, 2011; October 26, 2011; October 13, 2011; September 30, 2011; September 19, 2011; August 30, 2011	AMD 0042-59; 60-63; 72-87; 88-97; 98-117; 118-146; 147-177	Foundation

DATED this 18th day of March, 2016.

/s/ James S. Lowrie

James S. Lowrie
 Jessica P. Wilde
 Counsel for Plaintiff Global Freight Systems Co.
 W.L.L.

ELECTRONIC CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of March, 2016, I caused the foregoing
PLAINTIFF'S OBJECTIONS TO DEFENDANTS' PRETRIAL DISCLOSURES
PURSUANT TO FED. R. CIV. P. 26(a)(3) to be served, via electronic filing, on the
following:

Gary Anderson
Christian Hansen
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/s/ James S. Lowrie